

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

La Unión Del Pueblo Entero, *et al.*,

Plaintiffs,

v.

Gregory W. Abbott, *et al.*,

Defendants.

No. 5:21-cv-00844-XR

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,
NATIONAL REPUBLICAN SENATORIAL COMMITTEE, AND NATIONAL
REPUBLICAN CONGRESSIONAL COMMITTEE’S [PROPOSED] ANSWER**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

INTRODUCTION

1. The Republican Committees support free and fair elections for all Texans and for all voters across the country. The statements of public officials speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 1 and so deny them.

2. The Republican Committees admit that the Texas Legislature enacted Senate Bill (“SB”) 1. The statute speaks for itself and does not require a response. The remaining allegations in Paragraph 2 are legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

The Republican Committees specifically deny that SB 1 “suppress[es] Texas voters” or that Plaintiffs’ descriptions of the law and its effects are accurate. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 2 and so deny them.

3. The Republican Committees deny that SB 1 was enacted for “pretextual” reasons and deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008). Additionally, legislative history speaks for itself and does not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 3 and so deny them. Moreover, Paragraph 3 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

4. The Republican Committees deny that SB 1 is a “reaction” to any demographic changes in the electorate, that claims of threats to election integrity are “baseless,” that it is hard to vote in Texas elections, or that SB 1 makes it “harder” to vote. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 4 and so deny them.

5. The Republican Committees deny the allegations in Paragraph 5.

6. The Republican Committees deny that Plaintiffs are entitled to relief.

JURISDICTION AND VENUE

7. Paragraph 7 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 7.

8. Paragraph 8 states a legal conclusion that does not require a response. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 8.

PARTIES

9. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 9 and so deny them.

10. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 10 and so deny them.

11. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 11 and so deny them.

12. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 12 and so deny them.

13. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 13 and so deny them.

14. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 14 and so deny them.

15. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 15 and so deny them.

16. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16 and so deny them.

17. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 17 and so deny them.

18. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 18 and so deny them.

19. The Republican Committees admit that Plaintiff Longoria is the Harris County Elections Administrator.

20. Paragraph 20 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

21. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 21 and so deny them.

22. The Republican Committees admit that Defendant Abbott is the Governor of Texas and that Plaintiffs purport to sue him in his official capacity.

23. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas and that Plaintiffs purport to sue him in his official capacity.

24. The Republican Committees admit that Defendant Esparza is the Deputy Secretary of State of Texas and that Plaintiffs purport to sue him in his official capacity. Paragraph 24 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

25. The statutes speak for themselves and do not require a response. Paragraph 25 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

26. The lawsuit speaks for itself and does not require a response. Paragraph 26 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

27. Paragraph 27 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 27 and so deny them.

28. Paragraph 28 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

29. The Republican Committees admit that Defendant Torres is the Medina County Elections Administrator and that Plaintiffs purport to sue her in her official capacity.

FACTUAL BACKGROUND

30. Court decisions speak for themselves. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

31. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 31 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

32. Court decisions speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the

truth of the allegations in Paragraph 32 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

33. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 33 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

34. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 34 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

35. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 35 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

36. Court decisions speak for themselves and do not require a response. Paragraph 36 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

37. Court decisions speak for themselves and do not require a response. Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

38. Court decisions speak for themselves and do not require a response. Paragraph 38 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 38 and so deny them.

39. Paragraph 39 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 39 and so deny them. The Republican Committees specifically deny that Texas voting procedures are “onerous.”

40. Paragraph 40 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

41. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 41 and so deny them.

42. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 42 and so deny them.

43. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 43 and so deny them.

44. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 44 and so deny them.

45. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 45 and so deny them.

46. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 46 and so deny them.

47. The guidance issued by the Secretary of State speaks for itself and does not require a response.

48. The guidance issued by the Secretary of State speaks for itself and does not require a response.

49. The proclamation issued by Governor Abbott speaks for itself and does not require a response.

50. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 50 and so deny them.

51. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 51 and so deny them.

52. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 52 and so deny them.

53. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 53 and so deny them.

54. The Republican Committees deny that Governor Abbott or Attorney General Paxton “impos[ed] obstacles that limited exercise of the franchise.” The actions and statements of public officials speak for themselves and do not require a response. Paragraph 54 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 54 and so deny them.

55. The statements of public officials speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 55 and so deny them.

56. The statements of public officials speak for themselves and do not require a response. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 56 and so deny them.

57. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 57 and so deny them.

58. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 58 and so deny them.

59. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 59 and so deny them.

60. Legislative history speaks for itself and does not require a response. Paragraph 60 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that SB 1 contains any “restrictions designed to intimidate and discourage Texas voters and, in particular, Texas’s minority voters.”

61. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 61 and so deny them.

62. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 62 and so deny them.

63. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 63 and so deny them.

64. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 64 and so deny them.

65. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65 and so deny them.

66. The Republican Committees deny the allegations in Paragraph 66.

67. Legislative history speaks for itself and does not require a response. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 67 and so deny them.

68. The statute speaks for itself and does not require a response. The Republican Committees otherwise deny the allegations in Paragraph 68.

69. The referenced data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 69 and so deny them.

70. The government's health data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 70 and so deny them.

71. The statute speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny that SB 1 "imposes . . . new restrictions" on voter assistance.

72. The statute speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny that the assistor's oath is "onerous" or "intimidating."

73. The statute speaks for itself and does not require a response. Paragraph 73 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees deny that the assistor's oath will deter voters who need assistance or individuals from serving as assistors.

74. The statute speaks for itself and does not require a response. The Republican Committees deny the remaining allegations in Paragraph 74.

75. The statute speaks for itself and does not require a response. Paragraph 75 states legal conclusions and/or statements of what the law provides or should provide, to which no

response is required. To the extent a response is required, these allegations are denied. The Republican Committees deny the remaining allegations in Paragraph 75.

76. The Republican Committees deny that SB 1 will burden the right to vote of those seeking assistance. Paragraph 76 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 76 and so deny them.

77. The statute speaks for itself and does not require a response. Paragraph 77 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 77 and so deny them.

78. The statute speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny that SB 1 will “reduc[e] access to voting for voters who need assistance,” “depriv[e] them of assistance by their chosen assistors,” or “deter voter assistance.” Paragraph 78 also states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 78 and so deny them.

79. The Republican Committees deny the allegations in Paragraph 79.

80. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 80 and so deny them.

81. Statements made in a video during a 2021 training for poll watchers speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 81 and so deny them.

82. The statute speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny that SB 1 makes the work of election workers harder. Paragraph 82 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

83. The statute speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny that SB 1 “limits the ability of election officials and election judges to manage unruly poll watchers.” Paragraph 83 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

84. The statute speaks for itself and does not require a response. Paragraph 84 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

85. The statute speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny that SB 1 permits poll watchers to intimidate voters. Paragraph 85 states legal conclusions and/or statements of what the law provides

or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

86. The statute speaks for itself and does not require a response. Paragraph 86 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

87. The statute speaks for itself and does not require a response. Paragraph 87 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

88. The Republican Committees deny the allegations in Paragraph 88.

89. The statute speaks for itself and does not require a response. Paragraph 89 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

90. The statute speaks for itself and does not require a response. Paragraph 90 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

91. Paragraph 91 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

92. Paragraph 92 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 92 and so deny them.

93. The Republican Committees deny that SB 1 imposes burdens on voters.

94. Paragraph 94 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 94 and so deny them.

95. The statute speaks for itself and does not require a response. Paragraph 95 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 95 and so deny them.

96. The statute speaks for itself and does not require a response. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 96 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 96 and so deny them.

97. The statute speaks for itself and does not require a response. Paragraph 97 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

98. The statute speaks for itself and does not require a response. Paragraph 98 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

99. The statute speaks for itself and does not require a response. Paragraph 99 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 99 and so deny them.

100. The statute speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny that SB 1 prohibits outreach by election officials to eligible mail-in voters and deny that SB 1 will “reduce access” to mail voting. Paragraph 100 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 100 and so deny them.

101. The statute speaks for itself and does not require a response. Paragraph 101 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

102. The statute speaks for itself and does not require a response. Paragraph 102 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 102 and so deny them. The Republican Committees

specifically deny that SB 1 “criminalize[s] speech,” “restrict[s] access to mail voting” for eligible voters, or subjects officials to criminal prosecution for “clerical errors” or “good-faith mistakes.”

103. The statute speaks for itself and does not require a response. Paragraph 103 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that SB 1 “takes aim at community-based organizations.”

104. The statute speaks for itself and does not require a response. Paragraph 104 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

105. The statute speaks for itself and does not require a response. Paragraph 105 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

106. The statute speaks for itself and does not require a response. Paragraph 106 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

107. The statute speaks for itself and does not require a response. Paragraph 107 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 107 and so deny them.

108. Paragraph 108 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these

allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 108 and so deny them.

109. The Republican Committees deny the allegations in Paragraph 109.

110. The Republican Committees deny the allegations in Paragraph 110.

111. The statute speaks for itself and does not require a response. Paragraph 111 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 111 and so deny them.

112. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196.

113. The statute speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny that SB 1 will have a chilling effect on voter registration. Paragraph 113 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 113 and so deny them.

114. The statute speaks for itself and does not require a response. Paragraph 114 states legal conclusions and/or statements of what the law provides or should provide, to which no

response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 114 and so deny them.

115. The statute speaks for itself and does not require a response. Paragraph 115 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

116. The statute speaks for itself and does not require a response. Paragraph 116 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 116 and so deny them.

117. The statute speaks for itself and does not require a response. Paragraph 117 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 117 and so deny them.

118. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 118 and so deny them.

119. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 119 and so deny them.

120. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 120 and so deny them.

121. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 121 and so deny them.

122. The Republican Committees deny the allegations in Paragraph 122.

123. The Republican Committees deny the allegations in Paragraph 123.

124. The Republican Committees deny the allegations in Paragraph 124.

125. The Republican Committees deny that SB 1 permits poll watchers to intimidate voters. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 125 and so deny them.

126. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 126 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 126 and so deny them.

127. The Republican Committees deny that SB 1 has negative effects. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 127 and so deny them.

128. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 128 and so deny them.

129. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 129 states legal conclusions and/or statements of what the law provides or should provide, to which no response

is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 129 and so deny them.

130. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 130 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 130 and so deny them.

131. The Republican Committees deny the allegations in Paragraph 131.

132. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 132 and so deny them.

133. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 133 and so deny them.

134. The Republican Committees deny that SB 1's provisions are confusing or vague. Paragraph 134 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 134 and so deny them.

135. The Republican Committees deny that the confusion or fears about SB 1 are reasonable. Paragraph 135 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these

allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 135 and so deny them.

136. The Republican Committees deny that SB 1 will irreparably harm anyone. Paragraph 136 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 136 and so deny them.

137. The Republican Committees deny that SB 1 “criminalize[s]” voter assistance and deny that Plaintiff’s concerns are reasonable. Paragraph 137 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 137 and so deny them.

138. The Republican Committees deny that SB 1’s provisions are confusing or vague. Paragraph 138 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 138 and so deny them.

139. The Republican Committees deny that SB 1 will irreparably harm anyone. Paragraph 139 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations

are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 139 and so deny them.

140. The Republican Committees deny that SB 1 has negative effects. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 140 and so deny them.

141. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 141 and so deny them.

142. Paragraph 142 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 142 and so deny them.

143. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 143 and so deny them.

144. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 144 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 144 and so deny them.

145. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 145 states legal

conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 145 and so deny them.

146. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 146 and so deny them.

147. The Republican Committees deny that SB 1 will irreparably harm anyone. Paragraph 147 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 147 and so deny them.

148. Paragraph 148 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 148 and so deny them.

149. The Republican Committees deny that SB 1 imposes burdens on transportation to polling places and deny that SB 1 permits poll watchers to engage in intimidation. Paragraph 149 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 149 and so deny them.

150. The Republican Committees deny that SB 1's provisions are onerous, confusing or vague. Paragraph 150 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 150 and so deny them.

151. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 151 and so deny them.

152. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 152 and so deny them.

153. The Republican Committees deny that SB 1 will injure anyone. Paragraph 153 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 153 and so deny them.

154. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 154 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 154 and so deny them.

155. The Republican Committees deny that SB 1 will injure anyone. Paragraph 155 states legal conclusions and/or statements of what the law provides or should provide, to which no

response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 155 and so deny them.

156. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 156 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 156 and so deny them.

157. The Republican Committees deny that SB 1 has negative effects. Paragraph 157 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 157 and so deny them.

158. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 158 and so deny them.

159. Paragraph 159 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 159 and so deny them.

160. The Republican Committees deny the allegations in Paragraph 160.

161. The Republican Committees deny that SB 1 will irreparably harm anyone. Paragraph 161 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 161 and so deny them.

162. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 162 and so deny them. The Republican Committees specifically deny that SB 1 permits poll watchers to intimidate voters.

163. The Republican Committees deny that SB 1 imposes “barriers” on mail voting and deny that SB 1 will harm anyone. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 163 and so deny them.

164. The Republican Committees deny that SB 1 permits poll watchers to intimidate or harass voters. Paragraph 164 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 164 and so deny them.

165. The Republican Committees specifically deny that SB 1 “suppress[es] Latino voters,” “depress[es] Latino turnout,” or decreases the interest in or convenience of voting. Paragraph 165 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations

are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 165 and so deny them.

166. Paragraph 166 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 166 and so deny them.

167. The Republican Committees deny that SB 1 will irreparably harm anyone and deny that it has negative effects. Paragraph 167 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 167 and so deny them.

168. Paragraph 168 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 168 and so deny them.

169. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 169 and so deny them.

170. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 170 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these

allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 170 and so deny them.

171. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 171 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 171 and so deny them.

172. Paragraph 172 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 172 and so deny them.

173. The Republican Committees deny that SB 1 will irreparably harm anyone. The Republican Committees deny that SB 1 targets Latino registered voters or creates barriers to voting. Paragraph 173 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 173 and so deny them.

174. The Republican Committees deny that SB 1 will irreparably harm anyone. Paragraph 174 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 174 and so deny them.

175. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 175 and so deny them.

176. Paragraph 176 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 176 and so deny them.

177. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 177 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 177 and so deny them.

178. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 178 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican

Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 178 and so deny them.

179. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 179 and so deny them.

180. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 180 and so deny them.

181. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 181 and so deny them.

182. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 182 and so deny them.

183. Paragraph 183 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 183 and so deny them.

184. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 184 and so deny them.

185. The statute speaks for itself and does not require a response. Paragraph 185 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 185 and so deny them.

186. Paragraph 186 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 186 and so deny them.

187. Paragraph 187 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 187 and so deny them.

188. Paragraph 188 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 188 and so deny them.

COUNT I

189. The Republican Committees incorporate their responses to the preceding paragraphs.

190. Court decisions speak for themselves and do not require a response. Paragraph 190 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

191. Court decisions speak for themselves and do not require a response. Paragraph 191 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

192. The Republican Committees deny the allegations in Paragraph 192.

193. Paragraph 193 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that SB 1 “will impose severe burdens” on voters.

194. Paragraph 194 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that SB 1 “will impose severe burdens” on voters or “entirely deny” the right to vote.

195. Paragraph 195 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that SB 1 will “impose severe burdens” on voters or “entirely deny” the right to vote.

196. The Republican Committees deny the allegations in Paragraph 196. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196.

197. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 197 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

COUNT II

198. The Republican Committees incorporate their responses to the preceding paragraphs.

199. Section 1 of the Fourteenth Amendment to the U.S. Constitution speaks for itself and does not require a response.

200. Court decisions speak for themselves and do not require a response. Paragraph 200 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

201. The Republican Committees deny the allegations in Paragraph 201.

202. The Republican Committees deny the allegations in Paragraph 202.

COUNT III

203. The Republican Committees incorporate their responses to the preceding paragraphs.

204. Section 1 of the Fifteenth Amendment to the U.S. Constitution speaks for itself and does not require a response.

205. Court decisions speak for themselves and do not require a response. Paragraph 205 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

206. Court decisions speak for themselves and do not require a response. Paragraph 206 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

207. The Republican Committees deny the allegations in Paragraph 207.

208. The Republican Committees deny the allegations in Paragraph 208.

COUNT IV

209. The Republican Committees incorporate their responses to the preceding paragraphs.

210. Section 2 of the Voting Rights Act speaks for itself and does not require a response.

211. The Republican Committees deny the allegations in Paragraph 211.

212. The Republican Committees deny the allegations in Paragraph 212.

COUNT V

213. The Republican Committees incorporate their responses to the preceding paragraphs.

214. Section 208 of the Voting Rights Act speaks for itself and does not require a response.

215. The Republican Committees deny that SB 1 violates Section 208 of the Voting Rights Act. Court decisions speak for themselves and do not require a response. Paragraph 215 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

216. The Republican Committees deny that SB 1 violates Section 208 of the Voting Rights Act. Court decisions speak for themselves and do not require a response. Paragraph 216

states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

COUNT VI

217. The Republican Committees incorporate their responses to the preceding paragraphs.

218. Title II of the Americans with Disabilities Act speaks for itself and does not require a response.

219. Court decisions speak for themselves and do not require a response. Paragraph 219 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

220. The Republican Committees deny the allegations in Paragraph 220.

221. The Republican Committees deny the allegations in Paragraph 221.

222. The Republican Committees deny the allegations in Paragraph 222.

COUNT VII

223. The Republican Committees incorporate their responses to the preceding paragraphs.

224. Court decisions speak for themselves and do not require a response. Paragraph 224 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

225. The Republican Committees deny that SB 1 is unconstitutional. Court decisions speak for themselves and do not require a response. Paragraph 225 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

226. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 226 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

227. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 227 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

228. The Republican Committees deny that SB 1 is unconstitutional. Court decisions speak for themselves and do not require a response. Paragraph 228 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

229. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 229 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

COUNT VIII

230. The Republican Committees incorporate their responses to the preceding paragraphs.

231. The Republican Committees deny the allegations in Paragraph 231.

232. Court decisions speak for themselves and do not require a response. Paragraph 232 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

233. Court decisions speak for themselves and do not require a response. Paragraph 233 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

234. The Republican Committees deny the allegations in Paragraph 234.

235. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 235 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

236. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 236 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

237. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 237 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

238. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 238 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

239. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 239 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

240. The Republican Committees deny the allegations in Paragraph 240.

COUNT IX

241. The Republican Committees incorporate their responses to the preceding paragraphs.

242. The statute speaks for itself and does not require a response. Paragraph 242 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

243. The statute speaks for itself and does not require a response. Paragraph 243 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

244. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 244 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

245. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 245 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

246. The Republican Committees deny the allegations in Paragraph 246.

COUNT X

247. The Republican Committees incorporate their responses to the preceding paragraphs.

248. The Republican Committees deny the allegations in Paragraph 248.

249. The Republican Committees deny the allegations in Paragraph 249.

COUNT XI

250. The Republican Committees incorporate their responses to the preceding paragraphs.

251. The Republican Committees deny the allegations in Paragraph 251.

252. The Republican Committees deny the allegations in Paragraph 252.

PRAYER FOR RELIEF

The Republican Committees deny that Plaintiffs are entitled to the relief requested.

AFFIRMATIVE AND OTHER DEFENSES

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

FIRST AFFIRMATIVE DEFENSE

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

SECOND AFFIRMATIVE DEFENSE

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

THIRD AFFIRMATIVE DEFENSE

Plaintiffs lack standing to assert their claims in the Complaint.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred by the applicable statutes of limitations.

FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

SIXTH AFFIRMATIVE DEFENSE

Plaintiffs have failed to join indispensable parties to this action.

CONCLUSION

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

October 25, 2021

Respectfully submitted,

/s/ John M. Gore

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**Pro hac vice applications forthcoming*